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October 6, 2021

VIA ECF
Honorable Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: **United States v. Alicia Ayers**
Case No.: 21-CR-00440 -01

Dear Judge Roman:

We write to request a bail enlargement for Ms. Alicia Ayers. My client is requesting permission to travel to and from New Orleans, LA in order to secure business from local Airbnbs in Louisiana for her travel agency business.

Anticipated departure and possible flights - Date: October 30th, 2021 – from Newark to New Orleans, departing at 2:40 p.m. and arriving in New Orleans at 4:55 p.m.

Anticipated return and possible flights - Date: November 2nd, 2021 – from New Orleans to Newark, departing 7:00 p.m. and arriving in Newark at 11:02 p.m.

She will be residing at the Hilton Garden Inn located at the New Orleans Convention Center and will be meeting with personnel from various Airbnbs.

Please know that Pretrial Officer Jessica Killian and AUSA Courtney Heavey do not object to our request.

Thank you in advance for your consideration in this matter.

Respectfully submitted,

Deveraux L. Cannick

DLC/mw